

**DOCKET SECTION**  
**BEFORE THE**  
**POSTAL RATE COMMISSION**  
**WASHINGTON, DC 20268-0001**

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Postal Rate And Fee Changes, 1997

POSTAL RATE COMMISSION  
Docket No. R97-1

**INTERROGATORIES OF**  
**ALLIANCE OF NONPROFIT MAILERS**  
**TO UNITED STATES POSTAL SERVICE**  
**(ANM/USPS- ST-44-1 - 8)**  
**November 4, 1997**

The Alliance of Nonprofit Mailers hereby submits the following interrogatories and requests for production of documents:

ANM/USPS-ST-44-1. In your supplementary testimony USPS-ST-44, please refer to USPS-44A (LR-H-109), Table 1. The data in column 6 are referenced to LR-H-106. For the two pages of Table 1 that refer to Nonprofit Mail, (*i.e.*, pp. 6-7), and for each entry in column 6, please provide a precise reference to the page, row and column in LR-H-106. If the entries in Table 1, column 6 of LR-H-109 do not appear in LR-H-106, please indicate how they are computed, and provide complete references to all underlying data needed for all requisite computations.

ANM/USPS-ST-44-2. Please indicate how the fractional amounts shown on the last (unlabeled) row of Table 1, in columns 7,8 and 9 are derived or computed; *i.e.*, assuming that the number shown in the "Total" row represents the numerator, what is the denominator, and the source of the denominator?

ANM/USPS-ST-44-3.

- a. How many tallies underlie development of the cost of Standard A Nonprofit ECR Letters shown in Table 1, p. 6?
- b. How many tallies underlie development of the cost of Standard A Nonprofit ECR Non-Letters shown in Table 1, p. 7?
- c. What is the standard deviation of the unit cost of Nonprofit Mail walk-sequence and non-walk-sequence letters and non-letters?

ANM/USPS-ST-44-4. Do the tallies used to develop the costs in Table 1 include tallies for supervisors and technicians (Cost Segment 2), or are they confined to tallies for clerks and mailhandlers (Cost Segment 3)? Please explain why tallies for Cost Segment 2 are or are not included.

ANM/USPS-ST-44-5. Are the Standard A ECR tallies used to develop Table 1 in USPS-44A identical to the Standard A ECR tallies used for the study in USPS-44B? If not, please describe all differences in the two sets of tallies.

ANM/USPS-ST-44-6.

- a. Please describe all edits and other checks which Christensen Associates performed on the IOCS tallies received from the Postal Service.
- b. Please account for all tallies that were deleted from the original set of tallies received from the Postal Service—i.e, state how many were deleted, and explain why they were deleted.
- c. Please account for all tallies that were or could be considered questionable (*e.g.*, had


unusual entries, such as weight of Standard A Mail exceeding 16 ounces), but were nevertheless left in the database that was used to develop Table 1.

ANM/USPS-ST-44-7. Please refer to USPS-44A, p. 2, where you state that "this approach is conservative in the sense that it assigns to walk-sequence costs which have the possibility of being caused by walk-sequence mail." Please explain what you mean by "the possibility of being caused by walk-sequence mail." Specifically, what other possibilities exist, and what is the likelihood that those possibilities might occur?

ANM/USPS-ST-44-8.

- a. How many tallies in the study used to develop Table 1 in USPS-44A were a counted mixed mail tally?
- b. Please describe all entries in an IOCS mail processing tally that would identify and distinguish a mixed mail tally from a direct non-mixed mail tally.
- c. Please provide a legend which explains all entries that can be entered for counted mixed-mail tallies. That is, if the tally taker is instructed to enter some alpha-numeric combination, please explain what each possible entry means in terms of the counted mixed mail.

Respectfully submitted,

  
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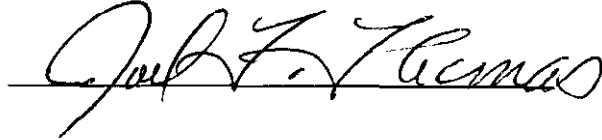
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*Counsel for Alliance of Nonprofit Mailers*

November 4, 1997

### **CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document on all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

A handwritten signature in cursive script, reading "Paul F. Thomas", written over a horizontal line.

November 4, 1997